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Attorneys for Plaintiff and the Class

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

KEVIN RISTO, on behalf of himself and
all others similarly situated,

Plaintiff,

vs.

SCREEN ACTORS GUILD-AMERICAN
FEDERATION OF TELEVISION AND
RADIO ARTISTS, a Delaware
corporation; AMERICAN
FEDERATION OF MUSICIANS OF
THE UNITED STATES AND
CANADA, a California nonprofit
corporation; RAYMOND M. HAIR, JR,
an individual, as Trustee of the AFM and
SAG-AFTRA Intellectual Property
Rights Distribution Fund; AUGUSTINO
GAGLIARDI, an individual, as Trustee
of the AFM and SAG-AFTRA
Intellectual Property Rights Distribution
Fund; DUNCAN CRABTREE-
IRELAND, an individual, as Trustee of

CASE NO. 2:18-cv-07241-CAS-PLA

CLASS ACTION

DISCOVERY MATTER

**NOTICE OF JOINT STIPULATION
RE: PLAINTIFF'S MOTION TO
COMPEL DISCOVERY UNDER L.R.
37-2**

Date: July 15, 2020
Time: 10:00 a.m.
Dept: 780
Judge: Hon. Paul L. Abrams

Discovery Cut-Off: Not Set
Pre-Trial Conference: Not Set
Trial Date: Not Set

1 the AFM and SAG-AFTRA Intellectual
2 Property Rights Distribution Fund;
3 STEFANIE TAUB, an individual, as
4 Trustee of the AFM and SAG-AFTRA
5 Intellectual Property Rights Distribution
6 Fund; JON JOYCE, an individual, as
7 Trustee of the AFM and SAG-AFTRA
8 Intellectual Property Rights Distribution
9 Fund; BRUCE BOUTON, an individual,
10 as Trustee of the AFM and SAG-AFTRA
11 Intellectual Property Rights Distribution
12 Fund; and DOE DEFENDANTS 1-10,

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14 Defendants.

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1 TO THE CLERK OF THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF
2 RECORD:

3 PLEASE TAKE NOTICE that on July 15, 2020 at 10:00 a.m., or as soon
4 thereafter as counsel may be heard, in Courtroom 780 of the Roybal Federal Building
5 and United States Courthouse, located at 255 E. Temple Street, Los Angeles, California
6 90012, 5th Floor, before the Honorable Paul L. Abrams, Plaintiff Kevin Risto will, and
7 hereby does, move the Court for an order compelling Defendants Screen Actors Guild-
8 American Federation of Television and Radio Artists (“SAG-AFTRA”), American
9 Federation of Musicians of the United States and Canada (“AFM”), Raymond M. Hair,
10 Jr., Augustino Gagliardi, Duncan Crabtree-Ireland, Stefanie Taub, Jon Joyce, and Bruce
11 Bouton (collectively, “Defendants”) to produce the documents listed on lines 1-49 of
12 the Privilege Log.

13 This Motion is made pursuant to Federal Rule of Civil Procedure 37 and Local
14 Rule 37-2. This Motion is based on this Notice of Motion and Motion, the concurrently
15 filed Joint Stipulation and Declaration of Mariana A. McConnell with Exhibits 1-6, the
16 record in this matter, and any further evidence or argument that may be received by the
17 Court at or before the hearing on this Motion.

18 This motion is made following the conference of counsel pursuant to L.R. 37-1
19 which took place telephonically on May 22, 2020.
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DATED: June 10, 2020

KIESEL LAW LLP

By: 

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